

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

ALUMINUM SHAPES, L.L.C.,

Debtor.

Chapter 11

Case No. 21-16520-JNP

Hon. Jerrold N. Poslusny, Jr.

**CERTIFICATION OF ROBERT MICHAELSON IN SUPPORT OF THE LIQUIDATING
TRUSTEE'S THIRD MOTION FOR ENTRY OF AN ORDER EXTENDING
THE DEADLINE FOR FILING OBJECTIONS TO CLAIMS**

I, Robert Michaelson, pursuant to 28 U.S.C. §1746, being of full age, certify as follows:

1. I am the Co-Manager and Co-Founder of Advisory Trust Group, LLC, the Liquidating Trustee in the above-captioned chapter 11 case (the "Liquidating Trustee"), and in that capacity, I am fully familiar with the Debtor's books and records and submit this Declaration in

support of the *Liquidating Trustee's Third Motion for Entry of an Order Extending the Deadline for Filing Objections to Claims* (the "Motion").¹

2. The Liquidating Trustee's request for an extension of the Second Extended Claims Objection Bar Date is not due to a lack of diligence on the part of the Liquidating Trustee. Rather, additional time is needed so that the Liquidating Trustee can (i) attempt to resolve by settlement various of the filed Claims in the case and (ii) continue its review of the Claims, object to those that cannot be resolved, and (iii) eventually make distributions to creditors. To that end, the Liquidating Trustee requests that the Second Extended Claims Objection Bar Date be extended through and including August 19, 2024.

3. Since the Effective Date, the Liquidating Trustee has reviewed hundreds of claims and has had three orders entered sustaining omnibus claim objections [Docket Nos. 668, 669, 760] the most recent of which is set for hearing before this Court on March 12, 2024. Further, counsel to the Liquidating Trustee has been in negotiation with certain holders of Claims to amicably resolve those Claims. After this Court approved the Second Motion to Extend the Claims Objection Bar Date, the Liquidating Trustee resolved seven preference claims. Further, the Liquidating Trustee is still in the process of attempting to settle the PPP loan forgiveness claims. The proposed extension will provide the Liquidating Trustee with time to conclude its review of the Claims and, if necessary, file additional omnibus objections to those claims that the Liquidating Trustee believes are objectionable.

4. The Liquidating Trustee believes the extension of the Second Extended Claims Objection Bar Date will result in the most successful outcome possible for the estate and ultimately

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

allow the Liquidating Trustee the time it needs to finalize its review and make distributions to creditors.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Robert Michaelson
Robert Michaelson

Dated: February 14, 2024